

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHELLE MARTINEZ-MARTE, a/k/a  
Marielys Burgos-Melendez,  
EDDIE MICHAEL BALDERRAMAS, a/k/a “Carlos,”  
and MICHAEL JAMES BALDERRAMAS,

Defendants.

**INDICTMENT**

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The Grand Jury charges:

**COUNT 1**

(Conspiracy to Transfer Identification Documents  
and the Means of Identification of Others to Obtain Michigan Driver’s Licenses)

From on or about April 4, 2016, until on or about July 20, 2017, in the Southern Division  
of the Western District of Michigan, and elsewhere,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, did unlawfully, willfully, and knowingly conspire, confederate and agree with one  
another, to commit offenses against the United States, as follows:

(a) to knowingly transfer one or more identification documents or false identification  
documents, including, but not limited to, the following:

1. Counterfeit Puerto Rican driver’s licenses;
2. Counterfeit or authentic Puerto Rican birth certificates; and
3. Counterfeit or authentic United States social security account number cards;

knowing that each such document was produced without lawful authority, in violation of Title 18, United States Code, Sections 1028(a)(2), 1028(b)(1)(A)(i) & (ii), and 1028(c)(1), (3)(A) & (B); and

(b) to knowingly transfer, possess, or use, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law, in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), and 1028(c)(3)(A) & (B). Specifically, defendants violated Michigan Compiled Law § 257.903 by aiding and abetting the false certification of an application for a Michigan driver's license and violated federal law by harboring, concealing or shielding an illegal alien in violation of Title 8, United States Code, § 1324, and by assisting previously removed aliens to remain in the country illegally in violation of Title 8, United States Code, § 1326(a). Defendants obtained more than \$1,000.00 in a one-year period as a result of the commission of the offense.

Specifically, defendants conspired to assist individuals, most of whom were illegal aliens, in acquiring authentic Michigan driver's licenses by using the means of identification of other persons set forth on the identification documents specified above during transactions with the Michigan Secretary of State's Office, such documents having appeared to be issued by or under the authority of the United States, having been transported in the mail, and/or the transfer of which affected interstate or foreign commerce.

### **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was to profit by charging individuals, most of whom were illegally present in the United States, a fee for providing them with Puerto Rican identity documents, social security account number cards, and other fraudulent documents, so that they

could transfer such documents to acquire Michigan driver's licenses in the identities of other individuals, thereby assisting them in avoiding detection by immigration authorities.

**MANNER AND MEANS OF THE CONSPIRACY**

To carry out the conspiracy, **MICHELLE MARTINEZ-MARTE** would communicate with individuals, most of whom were illegally present in the country, and who desired to establish a new identity. **MICHELLE MARTINEZ-MARTE** would inform these individuals that for a specified fee she would work with a source in Puerto Rico that would produce or obtain a Puerto Rican birth certificate, counterfeit Puerto Rican driver's license, and a social security account number card, in the name of an actual person. **MICHELLE MARTINEZ-MARTE** would take a photograph of each individual and provide the photograph to her source in Puerto Rico.

Once the identification documents arrived from Puerto Rico, **MICHELLE MARTINEZ-MARTE** would refer these individuals to **EDDIE MICHAEL BALDERRAMAS** or **MICHAEL JAMES BALDERRAMAS** so that the identification documents could be used to acquire an authentic Michigan driver's license in the individual's new identity. **EDDIE MICHAEL BALDERRAMAS** or **MICHAEL JAMES BALDERRAMAS** would typically transport the individuals from New York City, New York, or another location on the East Coast of the United States, to residences in the Western District of Michigan, where they harbored the individuals until they could transport the individuals to the Michigan Secretary of State's Office. When they transported the individuals to the Michigan Secretary of State's Office, they transferred the means of identification of other persons set forth on the Puerto Rican birth certificate, counterfeit Puerto Rican driver's license, and the social security account number card to the clerk and assisted the individuals in obtaining a Michigan

driver's license in the identity of another individual. **EDDIE MICHAEL BALDERRAMAS** or **MICHAEL JAMES BALDERRAMAS** typically transported these individuals back to New York City, New York, or to some other location on the East Coast of the United States, and collected their fee.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the object thereof, at least one of the following overt acts was committed in the Western District of Michigan by a member of the conspiracy.

1. On or about October 10, 2016, **EDDIE MICHAEL BALDERRAMAS** completed the transport of an individual with initials D.V.L. from New York City, New York, to 2110 S. Westnedge Avenue, Kalamazoo, Michigan.
2. D.V.L. spent the night at 2110 S. Westnedge Avenue, Kalamazoo, Michigan, in preparation for a trip to the Michigan Secretary of State's Office the next day.
3. On or about October 11, 2016, **MICHAEL JAMES BALDERRAMAS** prepared a fraudulent lease and fraudulent paychecks to make it appear as if D.V.L. was residing in Michigan and working at a company located in Michigan.
4. On or about October 11, 2016, **MICHAEL JAMES BALDERRAMAS** transported D.V.L. to a Michigan Secretary of State's Office located in the Western District of Michigan, where he assisted D.V.L. in transferring a counterfeit Puerto Rican birth certificate, counterfeit Puerto Rican driver's license, social security account number card, and the fraudulent lease and paystubs, all in the names of an actual individual with initials J.G.P., to the clerk at that office.

5. On or about October 11, 2016, D.V.L. paid **EDDIE MICHAEL BALDERRAMAS** \$2,000.00 cash for his assistance in acquiring a Michigan driver's license in the identity of another individual, J.G.P.

6. On or about January 3, 2017, **MICHAEL JAMES BALDERRAMAS** completed the transport of an individual with initials F.M. from New York City, New York, to 2110 S. Westnedge Avenue, Kalamazoo, Michigan, where he stayed until January 6, 2017.

7. Sometime between January 3, 2017, and January 6, 2017, **MICHAEL JAMES BALDERRAMAS** provided F.M. with an electric bill and telephone bill that made it appear as if F.M. resided in Michigan under the name of another individual, C.R.R.

8. On or about January 6, 2017, **MICHAEL JAMES BALDERRAMAS** transported F.M. to a Michigan Secretary of State's Office located in the Western District of Michigan, where he assisted F.M. in transferring a counterfeit Puerto Rican birth certificate, counterfeit Puerto Rican driver's license, social security account number card, and the fraudulent telephone and electric bills, all in the names of an actual individual with initials C.R.R., to the clerk at that office.

9. On or about January 6, 2017, F.M. paid **MICHAEL JAMES BALDERRAMAS** \$2,000.00 cash for his assistance in acquiring a Michigan driver's license in the identity of another individual, C.R.R.

18 U.S.C. § 1028(a)(2) and (7)  
18 U.S.C. § 1028(f)  
18 U.S.C. § 1028(b)(1)(A)(i) & (ii) & (D)  
18 U.S.C. § 1028(c)(1), (3)(A) & (B)

**COUNT 2**

(Concealing, Harboring, or Shielding from Detection an Illegal Alien)

On or about October 11, 2016, in the Southern Division of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, with knowledge and in reckless disregard of the fact that an alien, namely D.V.L., had come to, entered and remained in the United States in violation of law, aided and abetted one another in order to conceal, harbor, and shield from detection such alien for the purpose of commercial advantage and private financial gain. Specifically, defendants provided D.V.L. with a place of residence and then took him to the Michigan Secretary of State's Office, where he presented counterfeit and fraudulent identification documents containing the means of identification of another person in order to obtain an authentic Michigan driver's license in the identity of another individual, J.G.P., thereby concealing and shielding D.V.L. from detection by authorities.

8 U.S.C. § 1324(a)(1)(A)(iii)  
8 U.S.C. § 1324(a)(1)(A)(v)(II)  
8 U.S.C. § 1324(a)(1)(B)(i)

**COUNT 3**

(Concealing, Harboring, or Shielding from Detection an Illegal Alien)

On or about January 6, 2017, in the Southern District of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, with knowledge and in reckless disregard of the fact that an alien, namely F.M., had come to, entered and remained in the United States in violation of law, aided and abetted one another in order to conceal, harbor, and shield from detection such alien for the purpose of commercial advantage and private financial gain. Specifically, defendants provided F.M. with a place of residence and then took him to the Michigan Secretary of State's Office, where he presented counterfeit and fraudulent identification documents containing the means of identification of another person in order to obtain an authentic Michigan driver's license in the identity of another individual, C.R.R., thereby concealing and shielding C.R.R. from detection by authorities.

8 U.S.C. § 1324(a)(1)(A)(iii)  
8 U.S.C. § 1324(a)(1)(A)(v)(II)  
8 U.S.C. § 1324(a)(1)(B)(i)

**COUNT 4**

(Misuse of Social Security Account Number)

On or about October 11, 2016, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, with intent to deceive for the purpose of obtaining a Michigan driver's license, aided and abetted one another, and an individual with initials D.V.L., in falsely representing to an employee of the Michigan Secretary of State's Office, a social security account number that had not been assigned to D.V.L. by the Commissioner of Social Security.

42 U.S.C. § 408(a)(7)(B)

18 U.S.C. § 2(a)



**COUNT 5**

(Misuse of Social Security Account Number)

On or about January 6, 2017, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, with intent to deceive for the purpose of obtaining a Michigan driver's license, aided and abetted one another, and an individual with initials F.M., in falsely representing to an employee of the Michigan Secretary of State's Office, a social security account number that had not been assigned to him by the Commissioner of Social Security.

42 U.S.C. § 408(a)(7)(B)

18 U.S.C. § 2(a)

**COUNT 6**  
(Aggravated Identity Theft)

On or about October 11, 2016, in the Southern Division of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, during and in relation to the conspiracy to transfer false identification documents charged in Count 1, the harboring, concealing and shielding from detection an illegal alien charged in Count 2, and the misuse of a social security account number charged in Count 4 of this indictment, all of which are incorporated as if alleged herein, did aid and abet one another in the knowing transfer, possession, and use, without lawful authority, of the means of identification of J.G.P.

Specifically, when assisting D.V.L. in obtaining an authentic Michigan driver's license, defendants knowingly transferred, possessed, and used, without lawful authority, the name, social security account number, and date of birth of J.G.P.

18 U.S.C. § 1028A(a)(1)  
18 U.S.C. § 1028A(c)(4), (10) and (11)  
18 U.S.C. § 1028A(b)

**COUNT 7**  
(Aggravated Identity Theft)

On or about January 6, 2017, in the Southern Division of the Western District of Michigan,

**MICHELLE MARTINEZ-MARTE,  
EDDIE MICHAEL BALDERRAMAS, and  
MICHAEL JAMES BALDERRAMAS,**

defendants, during and in relation to the conspiracy to transfer false identification documents charged in Count 1, the harboring, concealing and shielding from detection an illegal alien charged in Count 3, and the misuse of a social security account number charged in Count 5 of this indictment, all of which are incorporated as if alleged herein, did aid and abet one another in the knowing transfer, possession, and use, without lawful authority, of the means of identification of C.R.R.

Specifically, when assisting F.M. in obtaining an authentic Michigan driver's license, defendants knowingly transferred, possessed, and used, without lawful authority, the name, social security account number, and date of birth of C.R.R.

18 U.S.C. § 1028A(a)(1)  
18 U.S.C. § 1028A(c)(4), (10) and (11)  
18 U.S.C. § 1028A(b)

A TRUE BILL



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GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE  
United States Attorney



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RONALD M. STELLA  
Assistant United States Attorney